



Suite 405, 4/F, Lee Garden Three, 1 Sunning Road • Causeway Bay, Hong Kong

Our Ref: L2022-003

February 24, 2022

Mr. Frank Fan CHAN
Secretary for Transport and Housing
20th Floor, East Wing
Central Government Offices, 2 Tim Mei Avenue, Tamar
Hong Kong Special Administration Region, China

Via email: sthoffice@thb.gov.hk

Re: Request to alleviate severe business aircraft aircrew quarantine restrictions

Dear Mr. Chan,

The Asian Business Aviation Association (ASBAA) presents its compliments to the Transport and Housing Bureau and has the honour of drawing its attention to the current critical restrictions with regards to flight crew quarantine requirements in Hong Kong.

Business aviation in Hong Kong has grown into a substantial industry over the past 25 years, supporting thousands of local families directly and indirectly by creating jobs and generating economic transactions. It has also brought Hong Kong recognition as one of the world's leading business aviation hubs. The industry's robustness in turn plays an important role in sustaining Hong Kong's status as a world financial centre and nexus of international commerce.

Our organisation and its members fully recognise the gravity of the local Covid-19 situation, and we unequivocally stand in unison with the Hong Kong government in its efforts to ensure the safety and well-being of all Hong Kongers.

We write this letter to share and explain our view on the current quarantine requirements for business aircraft crews. While there are several issues relating to the requirements that we would like to raise, we are particularly concerned about the requirement on flight crews to isolate during layovers (closed loop layovers).

It is our view that for business aviation crews, the current layover isolation requirement does little (if anything) to help in the fight against Covid, and that any possibly positive effect it has is far outweighed by the harm it is causing. Respectfully, the following are the reasons why:

- **Isolation during layovers provides no real additional safety benefits for the Hong Kong community.** This is because the nature of a business jet and its operation requires crew members to have close contact with passengers, who themselves are not required to isolate during layovers. Moreover, the

same quarantine applies to both passengers and crew on arrival back in Hong Kong.

- **The long and indeterminate length of business jet layovers can make closed loop layovers inhumane and jeopardise flight safety.** Unlike commercial airliners, business jets do not operate on fixed schedules and do not exchange crew for return flights. Business jet crews may be away from Hong Kong for several weeks or months at a time, and their date of return may not be decided until the last minute. Requiring crews to repeatedly self-isolate for such long, indeterminate periods away from their families negatively impacts their mental health, significantly jeopardising flight safety of both crew and passengers.
- **Unlike commercial airline crews, business jet crews carry out critical duties related to the maintenance and upkeep of their aircraft that cannot be carried out under quarantine isolation:**
 - Business jets regularly require 4 to 6 weeks of maintenance at a manufacturer-designated facility that is not uncommon to be outside of Hong Kong, and it is the duty of flight crew members to oversee this maintenance daily.
 - Business jet crews are required to carry out storage checks on their aircraft every 7 days when away from home base, which the crew cannot do if in isolation.

Most countries also do not have the infrastructure in place to facilitate the envisioned quarantine at the layover destination. Many lack, for example, hotels with the necessary sealed environments and staff with appropriate training and PPE.

Feedback from ASBAA members indicates that the closed loop layover requirement and lack of a plan for easing flight crew quarantine restrictions are major reasons why Hong Kong has lost to other nations approximately 80 of the 120 business jets that were stationed in Hong Kong at the onset of the pandemic. Many of those business jets are now stationed elsewhere, where the companies they serve have resumed operations and driving business and economic transactions with fewer quarantine and border restrictions while still maintaining a reasonable degree of safety precautions against Covid-19.

This departure of two-thirds of Hong Kong's business jet fleet has inflicted immense economic harm on the countless local businesses that maintained, serviced, and relied on the aircraft and their continuous missions. It is also a blow to Hong Kong's recognised position as a leading international business aviation hub, and by second-order effect, its status as an international finance centre and commercial nexus.



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Respectfully, we therefore urgently recommend that either:

- 1) The requirement for flight crew to self-isolate offshore (closed loop layover) be waived for business aviation altogether, or
- 2) That for any flights which exceed 3 days away from Hong Kong, the requirement to self-isolate offshore be waived.

AsBAA is available and keen to meet and discuss this matter that concerns many stakeholders both within the business aviation industry and the greater Hong Kong community. Additionally, we wish to make you aware of our hope for representation on bodies designing new quarantine regulations, so as to ensure the unique operational requirements of business aviation (particularly beyond ground operators at the airport) are fully taken into consideration in the process, and to have a voice for your consideration in the creation of meaningful and effective measures.

To this end, AsBAA urgently appeals to your office for support in the above requests for easing critical quarantine restrictions for crew. In the intervening time, AsBAA avails itself of the opportunity to renew to your office the assurance of its highest consideration and shall look forward to the results of any deliberations your office may have.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Zhendong Wu', is positioned above the typed name.

Zhendong Wu (Mr.)
Chairman
Asian Business Aviation Association